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19 *Attorneys for Carolyn Hallinan*

20 UNITED STATES DISTRICT COURT  
21 DISTRICT OF NEVADA

22 THOMAS W. McNAMARA, as the Court-  
23 Appointed Monitor for AMG Capital  
24 Management, LLC, et al.,

25 Plaintiff,

26 v.

27 LINDA HALLINAN, et al.,

28 Defendants.

Case No. 2:17-cv-02967-GMN-BNW

**STIPULATION AND ORDER TO  
EXTEND THE DEADLINE FOR  
DEFENDANT CAROLYN HALLINAN  
TO FILE RESPONSE TO PLAINTIFF'S  
MOTION TO AMEND PROTECTIVE  
ORDER**

**(First Request)**

Assigned to: Chief Judge Gloria M. Navarro

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1 Plaintiff, Court-Appointed Monitor Thomas W. McNamara ("Plaintiff"), and Defendant  
2 Carolyn Hallinan ("Defendant"), hereby stipulate to the following:

3 1. That the deadline for Defendant to file her response to Plaintiff's Motion to Amend  
4 Protective Order, filed on June 11, 2019, is currently scheduled for June 25, 2019;

5 2. That Defendant requires additional time to respond beyond the current deadline in light  
6 of the following: (i) Plaintiff received a subpoena from the U.S. Attorney's Office, Eastern District  
7 of Pennsylvania, for documents produced in this case through discovery and that are subject to the  
8 Protective Order; (ii) Defendant and Plaintiff are communicating with the Government regarding  
9 the documents sought in an effort to reach an agreement which would render the need to amend the  
10 Protective Order moot;

11 3. Therefore, Defendant shall have up to and including July 10, 2019, to file her response to  
12 Plaintiff's motion.

13 Dated: June 25, 2019

14 MCNAMARA SMITH LLP

Dated: June 25, 2019

STRADLEY RONON STEVENS & YOUNG, LLP

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*Attorneys for Defendant Carolyn Hallinan*

25 **IT IS SO ORDERED:**

26   
27 UNITED STATES MAGISTRATE JUDGE  
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DATED: June 26, 2019

## **CERTIFICATE OF SERVICE**

I am employed by the law firm of Semenza Kircher Rickard in Clark County, Nevada. I am over the age of 18 and not a party to this action. The business address is 10161 Park Run Drive, Suite 150, Las Vegas, Nevada 89145.

On the 25th day of June 2019, I served the document(s), described as:

**STIPULATION AND ORDER TO EXTEND THE DEADLINE FOR DEFENDANT  
CAROLYN HALLINAN TO FILE RESPONSE TO PLAINTIFF'S MOTION TO  
AMEND PROTECTIVE ORDER  
(First Request)**

by sending  an original  a true copy

a. via **CM/ECF System** (*You must attach the “Notice of Electronic Filing”, or list all persons and addresses and attach additional paper if necessary*)

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## ROGERS CASTOR

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Attorneys for Defendant Linda Hallinan

b. **BY U.S. MAIL.** I deposited such envelope in the mail at Las Vegas, Nevada. The envelope(s) were mailed with postage thereon fully prepaid. I am readily familiar with Semenza Kircher Rickard's practice of collection and processing correspondence for mailing. Under that practice, documents are deposited with the U.S. Postal Service on the same day, which is stated in the proof of service, with postage fully prepaid at Las Vegas, Nevada in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if the postal cancellation date or postage meter date is more than one day after the date stated in this proof of service.

c. BY PERSONAL SERVICE.

d. BY DIRECT EMAIL.

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1  e. **BY FACSIMILE TRANSMISSION.**

2 I declare under penalty of perjury that the foregoing is true and correct.

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4 /s/ *Olivia A. Kelly*

5 An Employee of Semenza Kircher Rickard

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